

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327
<hr/> THIS DOCUMENT RELATES TO ALL KLINE & SPECTER, P.C. WAVE 8 CASES	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**KLINE & SPECTER, P.C. PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION
FOR ORDER REGARDING DISPOSITION OF NON-REVISION GYNECARE TVT
PRODUCTS CASES**

Plaintiffs, herein, represented by Kline & Specter, P.C. (hereinafter "K&S Plaintiffs"), do not oppose the concept and general procedure as set forth in Defendants' Motion for Order Regarding Disposition of Non-Revision Gynecare TVT Products Cases. However, K&S Plaintiffs do propose several modifications to the proposed Order and respectfully request that several K&S Plaintiffs who were improperly included in Exhibit "A" to Defendants' Motion be removed from Exhibit "A" and that their cases proceed in Wave 8. K&S Plaintiffs incorporate their Memorandum in Support of Kline & Specter, P.C. Plaintiffs' Response to Defendants' Motion for Order Regarding Disposition of Non-Revision Gynecare TVT Products Cases and also the following exhibits:

Exhibit	Description
A	K&S Plaintiffs' Proposed Order
B	Case List of Improperly Included K&S Cases

WHEREFORE, for these reasons and for those more fully set forth in K&S Plaintiffs' supporting memorandum of law, K&S Plaintiffs respectfully request that this Court enter K&S


Plaintiffs' Proposed Order and allow the cases listed in Exhibit "B" to K&S Plaintiffs' Response proceed in Wave 8.

Respectfully submitted,

KLINE & SPECTER, PC

Dated: March 15, 2018

BY:



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CERTIFICATE OF SERVICE

I, Lee B. Balefsky, certify that on March 15, 2018, I electronically filed this document with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

KLINE & SPECTER, PC

A handwritten signature in black ink, appearing to be 'LB', written over a horizontal line.

LEE B. BALEFSKY, ESQUIRE

Dated: March 15, 2018